ADMINISTRATIVE LAW

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ADMINISTRATIVE LAW SECTION of AMERICAN BAR ASSOCIATION

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THE WASHINGTON MEETING

The Annual Meeting of the Administrative Law Section was held at Washington, D. C. on September 19. The Council met on September 18 to transact its business.

The Section meeting was held in the East Room of the Mayflower Hotel and was well attended. The Chairman of the Section, Mr. Ashley Sellers, of Washington, D. C., presided at the meeting.

At the morning session, a number of reports were made by the chairmen of different committees. The most notable feature of the morning session was an address by the Honorable Francis E. Walter, United States Representative from Pennsylvania, respecting a federal administrative practitioners act. Mr. Aaron Ford, of Washington, D. C., and Mr. John D. Randall, of Cedar Rapids, Iowa, also took part in a discussion of this topic.

Following the morning session, a joint luncheon was sponsored by the Section and by the Section of Administrative Law of the Bar Association of the District of Columbia and by the Division of Administrative Law of the Federal Bar Association in the Ballroom of the Mayflower Hotel.

Three hundred and sixty-two persons attended the luncheon. Mr. Sellers, Chairman of the Section, presented the awards to the winners in the Essay Contest on State Administrative Law sponsored by the Section. First prize was awarded to Mr. Frank E. Cooper of Detroit, Michigan, in the amount of $1500. Mr. Ralph N. Kleps, of Sacramento, California, and Mr. Maurice H. Merrill, of Norman, Oklahoma, each received $250 as joint winners of the second prize. Messrs. Robert M. Benjamin, of New York, New York, Whitney R. Harris, of Dallas, Texas, and Kenneth K. Luce, of Waukesha, Wisconsin, each of whom presented an essay which received honorable mention, were also introduced at the luncheon.

Mr. Nathaniel J. Ely, Chairman of the Section of Administrative Law of the Bar Association of the District of Columbia, introduced the distinguished guests who were present, and Mr. Thomas J. Flavin, Chairman of the Division of Administrative Law of the Federal Bar Association, introduced the principal speaker, the Honorable Gordon E. Dean, Chairman of the Atomic Energy Commission, who addressed the luncheon group with respect to the work of the agency which he heads.

Following the luncheon, the Section of Administrative Law resumed its meeting, at which time chairmen of the various committees made reports, and other business was transacted. In this issue of the Bulletin appears the full report of the Chairman of the Section to the House of Delegates.

This contains a report on the significant actions taken by the Section during its morning and afternoon sessions.

New officers for the coming year were elected, as follows:

Chairman: Mr. Reuben Hall, of Boston, Massachusetts

Vice-Chairman: Mr. Charles B. Nutting, of Pittsburgh, Pennsylvania

Secretary: Miss Patricia H. Collins, of Washington, D. C.

Section Delegate to House of Delegates: Mr. Carl McFarland, of Washington, D. C.

Council members for the coming year, in addition to the new officers who are ex-officio members of the Council, are:

Mr. Louis G. Caldwell, of Washington, D. C.

Mr. Charles E. Lane, of Cheyenne, Wyoming

Mr. Ralph M. Hoyt, of Milwaukee, Wisconsin

Judge George Rossman, of Salem, Oregon

Mr. W. James MacIntosh, of Philadelphia, Pennsylvania

Mr. Ashley Sellers, of Washington, D. C.

Mr. Whitney R. Harris, of Dallas, Texas

Mr. Clarence A. Miller, of Washington, D. C.

It was the consensus of those who attended that the meeting this year was one of the most successful ever held.

SUMMARY OF SECTION ACTIVITIES 1949-1950

There is reproduced in full below the report of Mr. Ashley Sellers, Chairman of the Section, with respect to the activities of the Section for the year 1949-1950.

The Section of Administrative Law submits herewith a report of its principal activities during the past year without recommendations for any specific action by the House of Delegates at its present session. The activities of the Section are divided into a number of different subjects for convenience of discussion.

Organization

One of the most notable features of the activities of the Section during the past year has been the attention devoted to perfecting its own organization. The Section of Administrative Law is a fairly new Section of the Association. During its first years as a committee, and later as a section of the Association, the activities of this Section were concerned primarily with dealing, on behalf of the Association, with certain events of prime importance taking place in the field of administrative law and procedure. There was, for example, the Walter-Logan Bill, and later, the bill which became, in 1946, the Administrative Procedure Act. Since that time the Section has been concerned, as it still is, with preserving the gains made by passage of the Administrative Procedure Act, and guarding against the withdrawal from coverage by that Act of various administrative agencies of the federal government.

Following the last annual meeting of the Association, it was determined that the Section had now reached a sufficient degree of maturity to warrant the devotion of some time to the perfection of its own organization. This determination was brought about also, in part, by the obvious necessity of providing for an effective organization which, at the beginning of the year, was composed of approximately 1100 members.

Accordingly, one of the first tasks of the Chairman, following the annual meeting last year in St. Louis, was to create a number of committees of the Section and select and appoint chairmen for those committees. After a great deal of consideration, it was decided that some of the committees could best be organized with respect to the activities of the particular federal agencies or activities. Accordingly, the Chairman of the Section established committees on the following subjects:

Agriculture, Food, Drugs, and Related Subjects
Advertising, Trade, and Securities Regulation
Communications (including Post-Office Department matters)
Gas and Electric Power
Immigration and Naturalization
Labor
Loyalty and Personnel Procedures
National Resources and Interior Affairs
Social Security, Veterans, and Benefits
Transportation (rail, motor, water, and air)

In addition to the foregoing, it was determined that other committees could be established with respect to particular legislation or proposals. Committees of this character established by the Chairman are as follows:

Administrative Court Proposal
Administrative Practitioners—Admission and Ethics
Administrative Procedure Act
Administrative Rules and Rule-Making
Administrative Salaries
Executive Reorganization
Selection and Qualification of Examiners and Personnel

To provide for the coordination of the work of all the foregoing committees, the Section's National Committee was designated as the medium through which all of the aforementioned committees report to the Chairman. The National Committee consists of its Chairman, the Vice-Chairmen, the chairmen of the seventeen committees reporting to the National Committee, and three additional members selected by the Chairman of the Section for their special qualifications. There are therefore twenty-two members of the Committee. It is the function of the Chairman of the National Committee, among other things, to resolve any conflicts which might result from an overlapping of the respective interests of the different committees. The Section's Committee on State Administrative Law was continued in effect. It is the function of this committee to keep abreast of all developments in the states respecting administrative law and to be in a position to make recommendations from time to time with respect to those developments.

Finally, the Chairman of the Section established a number of "housekeeping" committees designed to perform staff functions for the Section. Such committees deal with the following matters:

Annual Meeting
Membership
Organization and By-Laws
Publications

The Council of the Section continues to constitute an integral part of the Section's organization, and it acts as the executive committee of the Section. At its annual meeting, the Section adopted a change in its by-laws so as to add the retiring chairman of the Section to the Council for one year. This change will not become effective, however, until it is approved by the House of Delegates.

In January, 1950, the new chairmen of the aforementioned committees met with the Chairman of the Section in Washington, D. C., where the new organization of the Section was thoroughly discussed. This meeting proved to be of great value to all concerned and contributed substantially to the activities of the Section throughout the remaining part of the year. It is believed that the present organization of the Section, with such modification as may be necessitated by future contingencies, will provide an effective mechanism to handle the increasing volume of work which is coming within the purview of this expanding Section of the Association.

Membership

The membership of the Section has remained substantially the same in number during the 1949-50 year, there being slightly over 1100 members. However, this is not to be taken as an indication that no progress has been made as to the Section's membership. The Section's Committee on Food and Drugs recently was transferred to the Section of Corporation, Banking and Business Law, and this transfer resulted in a substantial loss of membership to the Section of Administrative Law. In addition, the Section has also lost members due to death, illness, and other reasons. In spite of this, however, the records of the Section show a growing interest in the Section by the addition of some 200 or more new members. While no sustained membership drive has been possible during this year due to the very limited budget available to the Section for its over-all activities, the Section is glad to report that through the personal activities and solicitation of its Chairman and other officers, the Section had added a substantial number of new members to its roster, which has more than offset the losses mentioned above.

Publications

The Section continued to publish the Administrative Law *Bulletin*, and it was well received. The aim of the Section, in publishing this *Bulletin*, is not only to afford a means of communicating Section business to Section members, but also to make available to Section members from time to time a summary of up-to-date developments in the field of administrative law and procedure, and to publish worth-while leading articles on timely topics.

During the year, the Section received the authorization of the Board of Governors to publish a book containing selected administrative law documents of lasting importance. It is the belief of the Section that such a book would make available to many people the principal documentary materials respecting administrative law and thereby promote further understanding and interest in the subject. Although the Section did not find it possible to complete and publish such a work this year, this project remains on its agenda as one of the principal tasks of the Section.

State Administrative Law

One of the activities of the Section of major importance during the year has been its work in connection with state administrative law. Through its Committee on State Administrative Law, headed by Dean Charles B. Nutting of the University of Pittsburgh School of Law, the Section has been active in collecting and disseminating information regarding procedural regula-

tions of state and local administrative agencies, and it has promoted studies of various administrative law problems at state and local levels. In the August 15, 1950, issue of the Administrative Law *Bulletin,* the Section published the results of a study of recent developments in state legislation involving the general control of administrative procedure. Members of the Section also participated in special state activities in Georgia, Arizona, Massachusetts, and in the District of Columbia, all of which were designed to stimulate the interest of the states concerned in the study of the administrative law and procedure of the state mentioned. The Section hopes to act as a clearing house of information respecting state problems and to foster the sound development of administrative law and procedure in each state.

Authority of Section to Represent Association

At its Mid-Winter meeting, the House of Delegates directed the Section, by all necessary and proper means, including appearances before legislative committees, (1) to preserve the gains made by the adoption of the Administrative Procedure Act as the law of the land, (2) to develop and seek the adoption of improvements thereof as well as additional measures to like purposes, and (3) to procure the assistance of officers, units and members of the Association as well as the cooperation of those of state and local bar associations.

With the concurrence of the Council of the Section, the National Committee was requested by the Chairman of the Section to assume responsibility for appearance before Congressional committees, on behalf of the Association, respecting amendments or exemptions from the Administrative Procedure Act.

The exercise of the authority thus delegated to the Section is regarded as one of great importance, to be exercised with extreme caution. During the year, two occasions have arisen in which an exercise of the authority has been deemed necessary and appropriate. The two instances in which this authority has been exercised are as follows:

(1) *Reorganization Plans.*—On March 13, 1950, the President, among other things, submitted Reorganization Plans numbered 7, 8, 9, and 11 to the Congress. Because of the peculiar language used in these plans as submitted to the Congress, they were deemed to be susceptible of the construction that Section 11 of the Administrative Procedure Act would be inapplicable to the Interstate Commerce Commission, the Federal Trade Commission, the Federal Power Commission, and the Federal Communications Commission. For this reason, these reorganization plans were opposed by the American Bar Association, acting through the Section of Administrative Law, the testimony being presented by the Chairman of the National Committee. Reorganization Plan No. 7 and Reorganization Plan No. 11 were rejected, but Reorganization Plans 8 and 9 were permitted to become effective.

(2) *S. 3455. Deportation of Aliens.*—There is pending before the United States Senate S. 3455, to revise the laws relating to Immigration, Naturalization, and Nationality. One provision in this bill would exempt from the requirements of the Administrative Procedure Act proceedings relating to the deportation of aliens. The effect of the passage of the bill, in this

respect, would be to override the decision of the Supreme Court of the United States in *Wong Yang Sung* v. *McGrath,* 339 U. S. 33, decided February 20, 1950, which held that the Administrative Procedure Act is applicable to administrative hearings in deportation proceedings. In this respect, the bill is similar to H. R. 10, which was opposed by the Administrative Law Section by letter submitted to the Chairman of the House Committee on the Judiciary on May 26, 1949, by the then Chairman of the National Committee. A request was made to the Senate Committee on the Judiciary for the right to appear to oppose the provision of S. 3455 which would exempt the proceedings in question from the requirements of the Administrative Procedure Act.

In the meantime, during the latter part of the second session of the 81st Congress, the Supplemental Appropriation Act, 1951 (H. R. 9526), was passed by the House containing, among other things, the following provision:

> "Proceedings under law relating to the exclusion or expulsion of aliens shall hereafter be without regard to the provisions of Sections 5, 7 and 8 of the Administrative Procedure Act (5 U. S. C. 1004, 1006, 1007)."

The Chairman of the National Committee immediately notified the Chairman of the Senate Committee on Appropriations of the opposition of the Association to this provision, the effect of which would be to override the decision of the Supreme Court in the *Wong Yang Sung* case. Notwithstanding the protest of the Association, however, the Senate Committee failed to remove the provision in question and the measure was approved by the Senate itself. At the time of the preparation of this report, H. R. 9526 is before a conference committee which, however, is without authority to remove the objectionable section from the bill, since there is no issue between the House and Senate with regard to this item. The result is that upon the passage of H. R. 9526, the *Wong Yang Sung* case will be overruled.

At its annual meeting, the Section, taking note of this situation, adopted a resolution expressing the disapproval of the Section to the action by the Congress in inserting the foregoing language in the Supplemental Appropriation Act, and directing its officers and Council to take all appropriate action which may be feasible to bring about the repeal of this objectionable provision.

Experience to date indicates that constant vigilance must be exercised to avoid attempts by the various federal agencies to secure exemptions from the Administrative Procedure Act. The present arrangement by the Association enables it to take speedy action in this matter, and it is believed that such arrangement should be continued indefinitely. The Section is mindful, on the other hand, that its delegation of authority to speak for the Association in this particular matter should be exercised only in instances of a truly emergency nature. It will, therefore, seek the approval of the House of Delegates or of the Board of Governors before it takes action, except in the extraordinary event in which action should be taken before there is time to obtain specific approval.

Pending Legislation

The Section has kept abreast of all of the pending legislation before the Congress respecting the Administrative Procedure

Act and related matters. A brief summary of this legislation, other than that already discussed, together with the action taken by the Section thereon, is given below.

S. 3076

This bill contains an amendment to Section 9(a) and to Section 10(e) of the Administrative Procedure Act. Section 9(a) would be amended to read as follows (the amendments are shown in italics):

> "Section 9. In the exercise of any power or authority.—'(a) In General.—*Standards of conduct and other requirements shall be prescribed prospectively and shall not be applied retroactively.* No sanction shall be imposed or substantive rule or order be issued except within jurisdiction delegated to the agency, *and within authority expressly or impliedly conferred by law upon the agency.*'"

Section 10(e) would be amended by adding a new sentence at the end thereof, as follows:

> "Statutory provisions shall not be interpreted as authorizing Agency action, findings or conclusions which are merely consistent with or not contrary to such provisions."

Apparently, these amendments are designed to cope with the problem raised by the recent decision of the Supreme Court in the second *Chenery case,* 332 U. S. 194, and possibly broadened in the *Engineers* case, 338 U. S. 96.

The Section feels that further study of this proposal should be made.

H. R. 7301

Section 10(d) of the Administrative Procedure Act authorizes reviewing courts to postpone the effective date of any agency action or to preserve status or rights pending conclusion of the review proceedings to the extent necessary to prevent irreparable injury. H. R. 7301 amends this provision by adding to the end thereof the following words:

> "(whether or not review proceedings have begun); in the case of agency action which is not final, a court which would have jurisdiction to review such action if it were final shall be considered a reviewing court for the purposes of this sentence."

The purpose of this amendment is apparently to clarify the situations in which interim relief pending judicial review may be granted. Since the right is limited to cases where such action is necessary to prevent irreparable injury, and the courts are given the right to impose conditions, there would appear to be adequate safeguards against any abuse of the authority which is added by this amendment.

The Section deems this proposal to require further investigation.

S. 1982

This bill is designed to make the Administrative Procedure Act applicable to certain hearings of the Post Office Department. It provides that in administering the provisions of Section 3929 and 4041 of the Revised Statutes (39 U. S. C. A. 259, 732) the Postmaster General shall, to the maximum extent determined by him to be consistent with the effectuation of the purposes of such sections, accord each affected addressee or payee an opportunity to have the charges against him adjudicated upon the record after an agency hearing. The bill further provides that Sections 5, 7, and 8 of the Administrative Procedure Act shall

be applicable in every case in which such opportunity for adjudication is so accorded.

The bill refers primarily to so-called fraud orders of the Post Office Department. The Department's current practice and procedure in these cases include much that is called for by Sections 5, 7 and 8 of the Administrative Procedure Act.

However, there is no provision for compliance with the third sentence and the last clause of the second sentence of Section 5(c) dealing with separation of functions; no provision is made for exceptions to recommended decisions; and the examiner is not required to state reasons for his recommendations. Other differences include: the inability of Trial Examiners to issue subpoenas or to take or cause depositions to be taken; the lack of a provision for providing respondent with a copy of the transcript; the lack of a provision for submitting proposed findings and conclusions; and a general lack of conformity with Section 11 of the Procedure Act dealing with trial examiners.

The bill as written appears to be a rather devious attempt to avoid the provisions of the Administrative Procedure Act. Although Sections 259 and 732 do not, in express terms, require a hearing, the courts have frequently held that such a requirement is the proper interpretation of those sections. In the light of this fact it seems quite likely that the courts may hold such proceedings to be subject to the Administrative Procedure Act under its present terms. Several lower court decisions are to the contrary (*Research Laboratories* v. *Donaldson*, D. C. for District of Columbia, 7/28/48, and *Roley Sales Co.* v. *Goldman*, D. C. for So. Dist. of New York, 10/18/48), but the recent decision by the U. S. Supreme Court in *Wong Yang Sung* v. *McGrath et al.*, decided February 20, 1950 [339 U. S. 33], may well provide the necessary precedent. In any event, the Section can see no justification for the qualifying phrase:

> "To the maximum extent determined by him to be consistent with the effectuation of the purpose of such sections"

nor can it see any basis for not including Section 11 of the Administrative Procedure Act in the list of Sections to be applicable. The phrase: "the maximum extent, etc." would provide an opening wedge for general avoidance of the Administrative Procedure Act by other agencies, and Section 11 should be included in order to secure the separation of functions not now found in these postal proceedings.

At its annual meeting the Section indicated its opposition to S. 1982.

S. 1973

This bill was introduced as a further amendment to the Communications Act of 1934, as amended, was unanimously passed by the Senate on August 9, 1949, and is now pending before the House Committee on Interstate and Foreign Commerce. (The substance of S. 1973 has been added by the Senate as an amendment to H. R. 4251, a bill respecting purchase of land for monitoring stations, which has already passed the House, and the matter must be taken up by a Conference Committee.)

The principal provisions of the bill have to do with specialized matters of particular interest to the Communications Bar and only four sections deal directly with the Administrative Procedure Act. Section 14 provides for the issuance of declaratory orders along lines similar to those set forth in the Administrative Procedure Act, but

it goes further by providing that such orders shall be issued only upon petition and after notice and opportunity for hearing and such orders shall be subject to judicial review. Section 15 deals with judicial review and provides for interim relief in language substantially similar to that of the Administrative Procedure Act. The provisions for interim relief are somewhat stronger than those set forth in Section 10(d) of the Administrative Procedure Act in that they confirm this authority by specific language rather than by inference. Section 17 amends directly three additional provisions of the Administrative Procedure Act. Subsection (a) provides that no hearing shall be held by a single commissioner. Subsection (b) expands on Section 8 of the Administrative Procedure Act dealing with the procedure in conducting hearings and the material to be included in the record. Subsection (c) places certain additional requirements on the conduct of hearing officers and other employees, both during the hearing and subsequent thereto, but before final decision. Its aim is apparently to clarify the separation of prosecutory and judicial functions. In so doing it does not change the Administrative Procedure Act but adds to it. Section 18 provides that except as specifically provided in the Act, provisions of the Administrative Procedure Act would apply in all proceedings of the Act.

This measure was discussed by the Section at its annual meeting.

An examination of these pertinent provisions indicates that they in no way violate the provisions of the Administrative Procedure Act. Rather they appear to accept the precedent set by the Act and to expand it further for purposes of greater clarity or additional safeguard. As a consequence this Section has no objection to the Act based on its function as a watch dog of the Administrative Procedure Act. The sole question raised is whether it is desirable to permit the procedure of individual agencies to be changed in this fashion rather than through amendments to the Procedure Act itself.

The Section believes that the primary purpose of the Procedure Act was to establish a uniform minimum standard, but not to prevent individual agencies being subject to additional standards. Consequently the Section has no objection to this bill. To the extent that the changes proposed are supplemental in nature they should certainly not be opposed by this Section. To the extent that the bill actually alters existing language of the Procedure Act, it is felt that those changes should be studied further to determine whether they could be properly applied to all agencies. The Communications and other similar groups should not be held up pending such study, however.

H. R. 5487 and H. R. 5488

The objectives of both of these bills are substantially similar and though it is understood that no action will be taken on these bills by the 81st Congress, they have been considered by the Section at its annual meeting.

H. R. 5487 provides that the Court of Appeals shall have exclusive jurisdiction to enjoin, set aside, suspend in whole or in part or to determine the validity of all final orders (a) of the Federal Communications Commission made under the Communications Act of 1934, as amended, and (b) of the Secretary of Agriculture under the Packers and Stockyards Act of 1921, as

amended, and under the Perishable Agricultural Commodities Act of 1930, as amended, except orders issued under Sections 309(e) and 317 of the Packers and Stockyards Act and Section 7(a) of the Perishable Agricultural Commodities Act and, (c) such final orders of the United States Maritime Commission entered under authority of the Shipping Act of 1916, as amended, and the Intercoastal Shipping Act of 1933, as amended, as are now subject to judicial review pursuant to the provisions of Section 31 of the Shipping Act of 1916, as amended. *H. R. 5488* provides for similar jurisdiction of the Court of Appeals in cases of final orders of the Interstate Commerce Commission entered under certain named provisions of the Interstate Commerce Act.

The main purpose of both bills is to provide for a uniform method of review of the orders named and to eliminate the present diversity of procedure under which certain orders of the same agency are reviewed by three-judge courts and others by the Courts of Appeals. Each bill contains certain provisions regarding the stay or suspension of orders pending review. H. R. 5487 contains an additional provision providing for procedure in cases where no hearing has been held. The Section requires the Court of Appeals to determine whether a hearing is required by law. Where it finds that a hearing is required, proceedings are remanded to the agency for that purpose, and where it finds that a hearing is not required, the Court of Appeals will pass on the issues if there is no genuine issue of material fact or transfer the proceedings to United States District Court if there is a genuine issue of material fact.

With the exception of this last mentioned provision both bills appear to be directed primarily along jurisdictional lines and do not purport to deal with matters within the scope of the Administrative Procedure Act. Section 10(d) of the Administrative Procedure Act does, of course, provide for interim relief and, therefore, would seem to make unnecessary the provisions of this bill dealing with that subject. Similarly, Section 7(d) of H. R. 5487 contains provisions regarding the scope of review which appear to merely express, though without equal clarity, the provisions of the Administrative Procedure Act on that subject.

The provisions of neither bill would seriously affect the Administrative Procedure Act insofar as the determination of what constitutes "final orders" is concerned. It would appear from the language that only such final orders of these agencies as are now subject to judicial review would be reviewable under these bills. Without more specific reference to the Administrative Procedure Act, the bills could not be held to amend the Procedure Act definition of what is a final order.

The provisions of Section 7(b) of H. R. 5487 dealing with the procedure where no hearing has been held do not appear to violate any existing requirement of the Administrative Procedure Act. Some question might be raised as to the advisability of transferring the proceedings to the District Court rather than back to the agency where no hearing is required by law. This appears to be a procedural requirement somewhat beyond anything contemplated by the Administrative Procedure Act, and this Section believes the matter is one which should be considered further by other committees of this Section organized specifically to deal with questions involving these particular agencies.

S. 14

The bill represents an attempt to eliminate certain of the overlapping functions of the administrative agencies. The bill is drawn in the form of an amendment to Section 9 of the Administrative Procedure Act and recommends the addition of a new subsection (c) providing in substance that where more than one agency is empowered to act with respect to the same general subject and to a similar purpose and effect, exclusive jurisdiction shall be in the agency which has the more specialized interest or, in the absence thereof, first undertakes to act in any case. Except where agency action is necessary to protect public health and safety or to remove discriminations against interstate and foreign commerce, agency action is prohibited where a state has undertaken active regulation or where the courts have jurisdiction to render equivalent relief. Agency action in the form of public proceedings is prohibited where the parties respondent default or waive them and, with certain exceptions, repetitious hearings and decision procedures are outlawed.

This bill was apparently introduced in an effort to focus attention on the overlapping jurisdiction of many of the agencies, for example, the Federal Trade Commission, the Food and Drug Administration, and the Post Office regulation of Foods and Drugs; and the responsibility for the enforcement of the antitrust laws now centered in both the F. T. C. and the Justice Department. It appears that the proponents of the bill also desired to call attention again to the continuous extension of federal administrative control into areas which have traditionally been in the domain of the states.

As written, S. 14 appears to be too comprehensive in its terminology and would not provide the necessary delineation between agencies. Terms such as "the more specialized interest in the subject" would undoubtedly promote extensive litigation. The Section recognizes that a substantial problem is dealt with by this legislation, but feels that the answer may well lie in appropriate amendments to the basic statutes after careful analysis and study has been made. To a certain extent the report of the Hoover Commission deals with this subject and has, at the very least, provided a background for further study of it.

At its annual meeting the Section disapproved of S. 14 in its present form and directed the creation of a Special Committee to study the problem raised by the bill.

Administrative Rules and Rule-Making

During the year, the Section, acting through its Committee on Administrative Rules and Rule-Making, has given consideration to the new code of federal regulations; to the use by federal agencies of their authority to dispense with the procedure specified in Section 4 of the Administrative Procedure Act; to judicial review of Federal Rent De-Control Orders; and to the operation of the statutory procedure in the formulation of food standards. One of the leading articles published in the *Bulletin* of the Section in the issue for September 1, 1950, was an article by Professor Maurice H. Merrill, entitled "Judicial Review of Federal Rent De-Control Orders under Recent Housing and Rent Legislation."

No definitive action has been taken by the Congress this year on the proposal to provide a system of uniform rules for all federal administrative agencies.

Administrative Practitioners

During the first session of the 81st Congress, *H. R. 4446* was introduced in the House of Representatives, having for its purpose the protection of the public with respect to practitioners before federal administrative agencies. This bill was favorably reported to the House by its Committee on the Judiciary, and has been considered by the House on a number of occasions without definitive action. Considerable opposition inside and outside of Congress had developed to this measure and, as a result, on April 25, 1950, Representative Francis E. Walter of Pennsylvania revised H. R. 4446 and introduced a new bill, *H. R. 8201*, upon the subject. The revised bill was favorably reported to the House on June 7, 1950, by the Committee on the Judiciary. In August, the Rules Committee took action to make it possible for the measure to be placed on the calendar, but continued opposition to the legislation has precluded any possibility of action during this session of the Congress. At its annual meeting, Representative Walter addressed the Section upon the subject of this bill, and the Section endorsed the legislation.

Administrative Court Proposals

Proposals for the establishment of an Administrative Court have been studied, but have not progressed to the point where Section action with respect thereto has been taken. Accordingly, the matter will continue to be the subject of study by the Section, particularly of its Committee on the Administrative Court.

Agriculture, Food, and Drugs

Certain resolutions adopted by the Section of Corporation, Banking, and Business Law were referred to the Section of Administrative Law for its views. Those proposals were considered by the Section's Committee on Agriculture, Food and Drugs, and, in turn, by the National Committee. So far as it was deemed necessary, these subjects were considered by the House of Delegates. Finally, the President of the American Bar Association authorized the Chairman of the Division of Food and Drugs, Section of Corporation, Banking and Business Law, to appear before the appropriate Congressional committees with respect to the legislative proposals involved.

Under the circumstances, therefore, no further action by this Section has been required with respect to this matter.

Federal Trade Commission's Rules of Practice

The Committee on Advertising, Trade and Securities Regulations gave extended consideration to the subject of limiting attorneys arguing cases before the Federal Trade Commission to subjects covered in Exceptions to the Trial Examiner's Report. The Federal Trade Commission, by amendments of its Rules of Practice published on April 19, 1950, limited the arguments before the Commission to those included in the appeal brief and provided that no further brief could be filed except by special leave. The amendment of the Commission's Rules of Practice met with the approval of the Committee on Advertising, Trade and Securities Regulations, so that no further action on that subject is required.

ASHLEY SELLERS, *Chairman*
Section of Administrative Law

September 21, 1950.

SECTION MEMBERSHIP

The directory of members of the Admintrative Law Section as of November 6, 1950, appears on the following pages. The Section has grown considerably from the time it was first created by the American Bar Association. Its purpose is to keep its members informed on developments of significance in the field of administrative law and to represent the Association in all matters respecting this specialized field. Experience has shown that the voice of the Association, speaking through its Section of Administrative Law, is exceedingly effective in influencing the course of events relative to administrative law. Lawyers everywhere find it beneficial to belong to the Section. Apart from this, the Section provides a mechanism by which the individual lawyer can bring to bear his own experience in shaping the development of the law.

New members are welcome. Persons desiring to become members may secure the necessary forms of applications by writing Miss Patricia H. Collins, Secretary, Section of Administrative Law, American Bar Association, at the Assistant Solicitor General's Office, Department of Justice, Washington 25, D. C. Lawyers who already belong to the Section can perform a real service by inviting lawyers in their communities who do not belong to the Section to apply for membership.

DIRECTORY OF MEMBERS
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NOVEMBER 6, 1950

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CALIFORNIA

W. N. Anderson
453 S. Spring
Los Angeles 13

Irving P. Austin
455 E. Compton Blvd.
Compton

Rufus Bailey
639 S. Spring St.
Los Angeles 14

Charles R. Baird
180 E. California St.
Pasadena

Eugene D. Bennett
Standard Oil Bldg.
San Francisco 4

A. B. Bianchi
901 Kohl Bldg.
San Francisco 4

Tsar N. Calfee
5701 Barrett St.
Richmond

Herbert W. Clark
1110 Crocker Bldg.
San Francisco

John G. Clarkson
507 Polk St.
San Francisco 2

Lloyd E. Clendening
512 Bay Cities Bldg.
Santa Monica

John G. Clock
630 Jergins Trust Bldg.
Long Beach

Zach Lamar Cobb
929-433 S. Spring St.
Los Angeles 13

Edward L. Compton
1232 Rowan Bldg.
Los Angeles 13

Frank J. Creede
220 Bush St.
San Francisco

Carlisle C. Crosby
1421 Central Bk. Bldg.
Oakland 12

Martin J. Dinkelspiel
333 Montgomery St.
San Francisco

Leslie G. Donahue
Philippine War Damage Comm.
APO 928, c/o P. M.
San Francisco

Forrest S. Drummond
703 Hall of Records
Los Angeles 12

Douglas L. Edmonds
Supreme Court
San Francisco

Philip S. Ehrlich
Russ Bldg.
San Francisco

Sheldon D. Elliott
3660 University Ave.
Los Angeles 7

Eugene M. Elson
541 S. Spring St.
Los Angeles 13

Stephen M. Farrand
215 W. 6th St., Rm. 1028
Los Angeles 14

Robert H. Gerdes
245 Market St.
San Francisco 6

Irving D. Gibson
Rm. 909, 926 Jay St.
Sacramento 14

William P. Gray
458 S. Spring St.
Los Angeles 13

Geraint Humpherys
367 S. Burnside Ave.
Los Angeles 36

J. Albert Hutchinson
600 State Bldg.
San Francisco 2

Leonard S. Janofsky
1225 Citizen Nat. Bank Bldg.
Los Angeles 13

R. E. H. Julien
220 Bush St.
San Francisco

Anthony J. Kennedy
635 Forum Bldg.
Sacramento 14

Ralph N. Kleps
State Capitol, Rm. 218
Sacramento 14

Guy Knupp
727 W. 7th St., Rm. 603
Los Angeles 14

Randell Larson
1010 Mills Bldg.
San Francisco 4

H. Harold Leavey
P. O. Box 959
Sacramento 4

Lester L. Lev
5600 Grand Ave.
Buena Park

Robert Littler
593 Market St.
San Francisco 5

Harry C. Mabry
Van Nuys Bldg.
Los Angeles 14

C. E. McDowell
812 Subway Terminal Bldg.
Los Angeles

Everett C. McKeage
2070 Pacific Ave.
San Francisco 9

Justin Miller
P. O. Box 415
Pacific Palisades

Archibald M. Mull, Jr.
515 Capitol Nat'l Bank Bldg.
Sacramento 14

Frank C. Newman
Boalt Hall
Univ. of Calif.
Berkeley 4

George W. Nilsson
908 Richfield Bldg.
555 S. Flower St.
Los Angeles 17

Julius J. Novack
315 Andreson Bldg.
San Bernardino

Russell F. O'Hara
525 Capitol St.
Vallejo

David H. Paltun
739 South Hope St.
Los Angeles 14

Richard A. Perkins
608 S. Hill St., Rm. 1010
Los Angeles 14

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McClean & Petty
650 S. Spring St.
Los Angeles 13

George R. Richter, Jr.
458 S. Spring St.
Los Angeles 13

Leslie L. Roos
220 Bush St.
San Francisco 4

Clarence B. Runkle
650 S. Spring St.
Los Angeles 14

John D. Russell
Menlo Junior College
Menlo Park

Paul E. Schwab
202 Bank of America Bldg.
Beverly Hills

William A. Sherwin
727 W. 7th St.
Los Angeles 14

Benjamin W. Shipman
523 W. 6th St., Rm. 511
Los Angeles 14

Alfred C. Skaife
518 Balboa Bldg.
San Francisco 14

James M. Souby, Jr.
c/o Santa Fe Ry.
114 Sansome St.
San Francisco

Albert Lee Stephens, Jr.
458 S. Spring St., Rm. 820
Los Angeles 13

Samuel B. Stewart, Jr.
c/o Bank of America
300 Montgomery St.
San Francisco 4

Roland G. Swaffield
Farmers & Merchants Bank Bldg.
Long Beach

Samuel Taylor
351 California St.
San Francisco 4

Max Thelen
111 Sutter St.
San Francisco

Clarence E. Todd
625 Market St.
San Francisco 5

William E. Turner
4209 Griffin Ave.
Los Angeles 31

Landis Weaver
1090 El Camino Real
Menlo Park

R. P. Wisecarver
315 Montgomery St.
San Francisco

Pierce Works
900 Title Ins. Bldg.
Los Angeles 13

Loyd Wright
111 W. 7th St.
Los Angeles 14

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Frank N. Bancroft
728 University Bldg.
Denver

L. Ward Bannister
801 Equitable Bldg.
Denver

Charles J. Beise
930 1st Nat. Bank Bldg.
Denver 2

Otis J. Gibson
1531 Stout St.
Denver 1

Charles H. Haines
2201 S. Filmore
Denver 10

Hubert Day Henry
Majestic Bldg.
209 16th St.
Denver

Frederic L. Kirgis
222 Equitable Bldg.
Denver 2

Donald C. McCreery
1217 1st Nat. Bank Bldg.
Denver 2

Truman A. Stockton, Jr.
1650 Grant St.
Denver 5

George K. Thomas
807 E & C Bldg.
Denver 2

Henry Wolcott Toll
Equitable Bldg.
Denver

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Robert C. Bell, Jr.
P. O. Box 120
Stamford

Keith W. Blinn
Sachem's Head
Vineyard Point
Guilford

Wallace W. Brown
49 Pearl St.
Hartford 3

John Laurence Collins
50 State St.
Hartford

Warren F. Cressy
Drawer 1295
Stamford

James F. Rosen
865 Chapel St.
New Haven 10

Jeremiah D. Shea
185 Church St.
New Haven 10

DELAWARE

Roger R. Horton
Atlas Powder Co.
Wilmington

DISTRICT OF COLUMBIA (WASHINGTON)

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600 Munsey Bldg. (4)

Isadore G. Alk
820 Woodward Bldg. (5)

Daniel J. Andersen
745 Shoreham Bldg. (4)

Monte Appel
404 Transportation Bldg. (6)

Robert Ash
Munsey Bldg. (4)

H. Thomas Austern
701 Union Trust Bldg. (5)

Frederick A. Ballard
912 American Security Bldg. (5)

James M. Barnes
1025 Connecticut Ave. (6)

Jesse E. Baskette
1809 G St., N. W., Apt. 606 (6)

Wilbur N. Baughman
717 Barr Bldg. (6)

Arthur M. Becker
839 17th St., N. W. (6)

Martin W. Bell
Commonwealth Bldg. (6)

Wendell Berge
Ring Bldg. (6)

Raoul Berger
Ring Bldg. (6)

Herbert M. Bingham
Tower Bldg. (5)

Frederick D. Binkley
6427 Utah Ave., N. W. (15)

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Carlile Bolton-Smith
3007 Que St. N. W. (7)

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729 15th St. N. W. (5)

Harry J. Breithaupt, Jr.
2511 Q St. N. W. (7)

Smith W. Brookhart
1025 Conn. Ave. (6)

Neil Brooks
3215 Morrison St. N. W. (15)

E. Fontaine Broun
616 Transportation Bldg. (6)

Miss Mary Agnes Brown
4606 15th St. N. W.

Thad H. Brown
735 Transportation Bldg. (6)

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Federal Power Comm.
1800 Pa. Ave. (25)

Louis G. Caldwell
World Center Bldg. (6)

Joseph T. Capelli
2122 Calif. St. N. W. (6)

Joseph A. Carey
1625 K St. N. W. (6)

Paul O. Carter
4215 38th St. N. W. (16)

Ugo Carusi
3720 Fordham Rd. (16)

Donald S. Caruthers
Wash. Loan & Trust Bldg. (4)

Hammond E. Chaffetz
World Center Bldg. (6)

John F. Clagett
1424 K St., N. W. (5)

Linton M. Collins
921 Tower Bldg. (5)

Patricia H. Collins
Department of Justice (25)

John D. Conner
828 Barr Bldg. (6)

Thomas M. Cooley, II
Tower Bldg. (5)

Harold B. Corwin
1741 K St. N. W. (6)

John J. Courtney
845 Continental Bldg. (5)

John W. Cragun
Munsey Bldg. (4)

Joseph M. Creed
1317 F St. N. W. (4)

Richard D. Daniels
235 Washington Bldg. (5)

Albert Laplace Dart
3429 34th Pl. N. W. (16)

Kenneth C. Davis
Hibbs Bldg., 10th Floor (5)

William I. Denning
1518 K St. N. W. (5)

Dean Dinwoodey
24th & N Sts. (7)

John F. Donelan
707 Munsey Bldg. (4)

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American Univ.
1901 F St. N. W. (6)

Richard S. Doyle
404 Transportation Bldg. (6)

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Georgetown Law School
506 E St. N. W. (1)

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5020 Linnean Ave. N. W. (8)

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World Center Bldg. (6)

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3619 Van Ness St. N. W. (8)

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918 16th St. N. W., Suite 501 (6)

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1728 Mass. Ave. N. W. (6)

Aaron L. Ford
Munsey Bldg. (4)

Henry Hamill Fowler
1703 K St. N. W. (6)

Walter Freedman
829 Washington Bldg. (5)

Milton V. Freeman
1200 18th St. N. W. (6)

Robert Elliott Freer
712 Jackson Pl. N. W. (6)

Ward M. French
1016 Tower Bldg. (5)

G. Arthur Fuller
1717 R St. N. W. (9)

Raymond F. Garrity
301 Tower Bldg. (5)

Irwin Geiger
102 Tower Bldg. (5)

Edgar J. Goodrich
1200 Ring Bldg. (6)

Joseph R. Gorman
1740 K St. N. W. (6)

Charles E. Grandey
Fed. Trade Comm., Rm. 508 (25)

Weston B. Grimes
436 Bowen Bldg. (5)

Benjamin G. Habberton
3103 Hawthorne St. N. W. (8)

K. Robert Hahn
1317 F St. N. W. (4)

Charles A. Haile
Bowen Bldg. (5)

James W. Haley
804 Southern Bldg. (5)

Charles D. Hamel
1000 Shoreham Bldg. (5)

Chisman Hanes
710 Ring Bldg. (6)

Douglas W. Hartman
530 Washington Bldg. (5)

James J. Hayden
1323 18th St. N. W. (6)

Charles B. Heinemann, Jr.
740 11th St. N. W. (1)

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Edward J. Hickey, Jr.
Tower Bldg. (5)

James Leonard Highsaw, Jr.
57 Chevy Chase Pkwy. N. W. (15)

Melvin Davis Hildreth
716 Evans Bldg. (5)

Arthur T. Hoadley
3607 34th St. N. W. (8)

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Union Trust Bldg. (5)

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Edward F. Howrey
Shoreham Bldg. (5)

Minor Hudson
Washington Bldg. (5)

Irving Jaffe
501 13th St. N. W. (4)

Samuel H. Jaffee
918 DuPont Circle Bldg. (6)

Guilford Jameson
1100 Continental Bldg. (5)

Frank J. Kelly
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Major Bernard R. Kennedy
National Archives (25)

Harold L. Kennedy
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Ralph M. Ketcham
2120 16th St. N. W. (9)

H. Donald Kistler
921 Tower Bldg. (5)

Sumner Sigsbee Kittelle
1044 Shoreham Bldg. (5)

Hans A. Klagsbrunn
Ring Bldg. (6)

John F. Lane
1625 K St. N. W. (6)

Glen R. Law
5203 41st St. N. W. (15)

C. Edward Leasure
1518 K St. N. W. (5)

Frederic P. Lee
807 Ring Bldg. (6)

Roy Leifflen
932 Shoreham Bldg. (5)

Harrison Lillibridge
1921 Kalorama Rd. N. W. (9)

Harry S. Littman
1025 Vermont Ave. N. W. (5)

Mrs. Fanney Neyman Litvin
2023 Que St. N. W. (9)

Horace L. Lohnes
600 Munsey Bldg. (4)

Karl D. Loos
Munsey Bldg. (4)

Eliot C. Lovett
729 15th St. N. W. (5)

Richard K. Lyon
701 Evans Bldg. (5)

William P. MacCracken, Jr.
Nat. Press Bldg. (4)

Donald Macleay
1625 K St. N. W. (6)

John H. MacVey
1025 Conn. Ave. (6)

Hubert H. Margolies
Quebec House South, Apt. 610
2800 Quebec St. N. W.

Michael Fernolend Markel
Munsey Bldg. (4)

Leonard H. Marks
517 Evans Bldg. (5)

Roger P. Marquis
Dept. of Justice (25)

Lowell B. Mason
c/o Fed. Trade Comm'n (25)

John E. McClure
626 Washington Bldg. (5)

William Francis McDonnell
Tower Bldg. (5)

Carl McFarland
1302 18th St. N. W., Suite 502 (6)

John A. McIntire
Bur. of Int. Rev., Rm. 2245
Excess Profits Tax Council (25)

Henry J. Merry
3232 Internal Revenue Bldg. (25)

Clarence A. Miller
2000 Mass. Ave. N. W. (6)

Kenneth Dobson Miller
Transportation Bldg. (6)

Warren E. Miller
910 17th St. N. W. (6)

William E. Miller
1139 Shoreham Bldg. (5)

John P. Moore
1317 F St. N. W. (4)

Gerald D. Morgan
413 Washington Bldg. (5)

George Maurice Morris
905 American Security Bldg. (5)

Giles Morrow
1220 Dupont Circle Bldg. (6)

Godfrey L. Munter
844 Shoreham Bldg. (5)

James A. Murray
Bureau of Motor Carriers
Interstate Commerce Comm'n (25)

Frank C. Nash
5035 Macomb St. N. W. (16)

Monroe Oppenheimer
1026 Woodward Bldg. (5)

D. M. Patrick
2737 Devonshire Pl. (8)

Gordon Pickett Peyton
Dupont Circle Bldg. (6)

Henry H. Pike
1644 21st St. N. W. (9)

L. Welch Pogue
730 Southern Bldg. (5)

John H. Pratt
905 American Security Bldg. (5)

Ganson Purcell
Suite 617, 910 17th St. N. W. (6)

William A. Quinlan
1317 F St. N. W. (4)

Albert E. Reitzel
Dept. of Justice (25)

Charles S. Rhyne
730 Jackson Pl. (6)

Frank Roberson
Munsey Bldg. (4)

William Allerton Roberts
New Mayflower Off. Bldg. (6)

Reed T. Rollo
World Center Bldg. (6)

Russell Rowell
Munsey Bldg. (4)

Percy H. Russell, Jr.
World Center Bldg. (6)

Arthur W. Scharfeld
Nat. Press Bldg. (4)

Paul M. Segal
816 Conn. Ave. (6)

Ashley Sellers
1302 18th St. N. W., Rm. 502 (6)

John E. Shea
914 Ring Bldg. (6)

Robert H. Shields
5 Carvel Circle
Westmoreland Hills
Friendship 16

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1650 Harvard St. N. W. (9)

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600 Continental Bldg. (5)

Edward S. Smith
404 Transportation Bldg. (6)

William P. Smith
Metropolitan Bank Bldg. (5)

Charles Effinger Smoot
606 American Bldg. (4)

Harvey M. Spear
Dept. of Justice, Rm. 4316 (25)

Paul D. P. Spearman
Munsey Bldg. (4)

E. Edward Stephens
Munsey Bldg. (4)

Robert L. Stern
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Clair L. Stout
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William A. Sutherland
Ring Bldg. (6)

Sutherland G. Taylor
720 DuPont Circle Bldg. (6)

William Cutler Thompson
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Herman Tocker
734 15th St. N. W. (5)

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Kellogg Bldg. (4)

John Hart Todd
1037 Woodward Bldg. (5)

Neil Tolman
1025 Conn. Ave. (6)

South Trimble, Jr.
3111 Macomb St. N. W.

A. Devitt Vanech
Dept. of Justice (25)

F. Trowbridge vom Baur
1346 Conn. Ave. (6)

Warren H. Wagner
1031 Continental Bldg. (5)

Lt. Comd. Homer A. Walkup, USN
840 Arlington Annex, Rm. G
Bur. of Naval Personnel (25)

Ralph Page Wanlass
1109 Earle Bldg. (4)

Jack Wasserman
4349 Yuma St. N. W. (16)

Robert C. Watson
815 15th St. N. W.

Charles F. Welch
3601 Conn. Ave. N. W., #504 (8)

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520 Shoreham Bldg. (5)

Asher L. Wheeler
1886 Monroe St. N. W. (10)

Edward K. Wheeler
Southern Bldg. (5)

Frank J. Wideman
Bowen Bldg.
815 15th St. N. W. (5)

Claude C. Wild, Jr.
605 Commonwealth Bldg. (6)

Ernest L. Wilkinson
744 Jackson Pl. N. W. (6)

Nathan B. Williams
3917 McKinley St. (15)

Miss Louisa Wilson
2818 Wisconsin Ave. (7)

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605 Southern Bldg. (5)

FLORIDA

Henry P. Adair
P. O. Box 4487
Jacksonville

Ray C. Brown
1st Nat. Bank Bldg., 4th Floor
Tampa 2

Warren Glasgow
227 Shoreland Bldg.
Miami 32

Lemuel A. Haslup
College of Law
John G. Stetson Univ.
Deland

Bernard J. Langston
Box 586
Lakeland

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Metcalf Bldg.
Orlando

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St. Petersburg 5

Alfred L. McCarthy
P. O. Box 1069
Miami 6

Prof. George John Miller
College of Law
Univ. of Fla.
Gainesville

William C. Pierce
214 Madison St.
Tampa

Pierre Robineau
1025 DuPont Bldg.
Miami 32

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7124 Trouville Esplanade
Miami Beach 41

T. M. Shackleford, Jr.
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Tampa

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GEORGIA

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1516 1st Nat. Bank Bldg.
Atlanta

John S. Candler, II
410 Palmer Bldg.
Atlanta

Frank A. Constangy
1404 Candler Bldg.
Atlanta 3

Maurice S. Culp
Lamar School of Law
Emory Univ.

J. Q. Davidson
P. O. Box 1199
Columbus

Daniel Duke
623 Volunteer Bldg.
Atlanta 3

David Meade Feild
Law School
Univ. of Ga.
Athens

Ray B. Friedin
Hargrove Bldg.
Vienna

E. Smythe Gambrell
825 C. & S. Nat. Bank Bldg.
Atlanta

W. Glen Harlan
825 C. & S Bank Bldg.
Atlanta 3

C. Baxter Jones
10th Floor, Persons Bldg.
Macon

Morris W. Macey
1415 Healey Bldg.
Atlanta

Douglas W. Matthews
1417 1st Nat. Bank Bldg.
Atlanta

Harold L. Russell
825 C. & S. Nat. Bk. Bldg.
Atlanta 3

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Atlanta 3

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c/o Civil Aeronautics Adm.
84 Marietta St. N. W.
Atlanta 3

IDAHO

Laurel E. Elam
P. O. Box 2356
Boise

Harold J. Hull
P. O. Box 709
Wallace

ILLINOIS

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7 S. Dearborn St.
Chicago 3

Robert Clyde Barker
The Northern Trust Co.
Chicago 90

Benjamin M. Becker
33 N. LaSalle St.
Chicago 2

Nuel D. Belnap
2106, 135 S. LaSalle St.
Chicago

Miss Dorothea Blender
214 N. Mich. Ave.
Chicago 1

Ben B. Boynton
501 Security Bldg.
Springfield

James R. Bryant
231 S. LaSalle St., Rm. 705
Chicago 4

S. Charles Bubacz
201 N. Wells St.
Chicago 6

Edward M. Bullard
72 W. Adams St.
Chicago 3

Robert Norris Burchmore
2106 Field Bldg.
Chicago 3

Daniel D. Carmell
130 N. Wells St., Rm. 1100
Chicago

Robert M. Clark
A. T. & S. F. Ry. Co.
80 E. Jackson Blvd., Rm. 1211
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Chicago 4

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Chicago 3

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Chicago

John Dern
11 S. LaSalle St.
Chicago

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Chicago 3

Walter F. Dodd
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Chicago 2

Thomas J. Downs
135 S. LaSalle St.
Chicago 3

Palmer D. Edmunds
30 N. LaSalle St.
Chicago 2

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1745, 33 S. Clark St.
Chicago

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1709 Harris Trust Bldg.
Chicago 3

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Chicago 4

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Chicago 3

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Chicago

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Chicago 4

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Evanston

Hugh J. Graham, Jr.
404 Reisch Bldg.
Springfield

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815, 77 W. Washington St.
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307 N. Mich. Ave.
Chicago 1

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134 N. LaSalle St.
Chicago 2

Harold T. Halfpenny
111 W. Washington St.
Chicago

Helmer Hansen
231 S. LaSalle St., Rm. 1213
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Chicago 10

Gray Herndon
916 Illinois Bldg.
Springfield

Lyndle W. Hess
c/o Libby, McNeill & Libby
Union Stock Yards
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Chicago 3

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Chicago 6

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Chicago 6

Norman P. Jones
First Nat. Bank Bldg.
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Chicago 3

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Elmhurst

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216 7th St.
Cairo

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Chicago 3

Morris I. Leibman
208 S. LaSalle St.
Chicago 4

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Chicago 3

Glen A. Lloyd
135 S. LaSalle St., Rm. 2600
Chicago 3

Nellie MacNamara
79 W. Monroe St., Rm. 823
Chicago 3

Hugh M. Matchett
6133 Ellis Ave.
Chicago 37

David O. Mathews
332 S. Mich. Ave.
Chicago 4

Walter R. McFarland
C. B. & Q. R. R. Co.
547 W. Jackson Blvd.
Chicago

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1060 Rookery Bldg.
Chicago 4

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Chicago 3

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301 First Nat. Bank Bldg.
Champaign

Anthony L. Michel
1430 1st Nat. Bank Bldg.
Chicago

Carl R. Miller
457 Citizens Bldg.
Decatur

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Chicago 3

Sidney Mogul
77 W. Washington
Chicago 2

Michael F. Mulcahy
2128, 33 N. LaSalle St.
Chicago 2

Thomas E. Murphy
111 W. Washington St.
Chicago

Timothy J. Murtaugh
231 S. LaSalle St.
Chicago 4

Nathaniel L. Nathanson
357 E. Chicago Ave.
Chicago 11

Ivar N. Nelson
1659 1st Nat. Bank Bldg.
Chicago

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100 W. Monroe St.
Chicago 3

Richard S. Oldberg
111 W. Monroe St.
Chicago 3

Wm. H. Ott, Jr.
500 Peshtigo Court
Chicago

Robert Sidney Outlaw
1211, 80 E. Jackson Blvd.
Chicago

Anan Raymond
11 S. LaSalle St.
Chicago

Clarence H. Ross
72 W. Adams St.
Chicago

Henry Glenn Ross *
77 W. Washington St.
Chicago 2

Harry L. Rudnick
29 S. LaSalle St.
Chicago 3

Horace Russell
7 S. Dearborn St., Rm. 1720
Chicago 3

Werner W. Schroeder
1 N. LaSalle St., 2141
Chicago 2

Andrew C. Scott
547 W. Jackson Blvd.
Chicago 6

Roger L. Severns
72 W. Adams St., Room 1700
Chicago 3

Floyd Francis Shields
111 W. Washington St., Rm. 1053
Chicago 2

Anthony A. Slakis
127 N. Dearborn St.
Chicago 2

Erwin P. Snyder
2310, 135 S. LaSalle St.
Chicago 3

Harold E. Spencer
135 E. 11th Pl.
Chicago

Warren T. Spies
20 N. Wacker Drive
Chicago 6

Robert A. Sprecher
231 S. LaSalle St.
Chicago 4

Clement F. Springer
327 S. LaSalle St.
Chicago 4

Harry Seward Stark
33 N. LaSalle St.
Chicago 2

John E. Stipp
Continental Casualty Co.
310 S. Mich. Ave.
Chicago 4

William N. Strack
4115 Packers Ave.
Chicago 9

Thomas E. Sunderland
910 S. Mich. Ave.
Chicago 5

William H. Symmes
33 N. LaSalle St., Suite 3200
Chicago 2

Starr Thomas
80 E. Jackson Blvd.
Chicago 4

Leo F. Tierney
Continental Illinois Bank Bldg.
Chicago 4

Calvin D. Trowbridge
72 W. Adams St., Rm. 1600
Chicago 3

J. Thor Wanless
1st Nat. Bank Bldg.
Springfield

Jerome S. Weiss
77 W. Washington St.
Chicago 2

Benjamin Wham
231 S. LaSalle St.
Chicago

James H. Wheat
113 N. Neil St.
Champaign

Elmer J. Whitty
77 W. Washington St., Rm. 1621
Chicago 2

Marshall Wiedel
135 S. LaSalle St.
Chicago 3

Harlington Wood
County Court House
Springfield

John Amos Wright
11 S. LaSalle St., Rm. 611
Chicago 3

Edward A. Zimmerman
1709 Harris Trust Bldg.
Chicago 3

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1313 Merchants Bank Bldg.
Indianapolis 4

Robert D. Armstrong
1344 Consolidated Bldg.
Indianapolis

Frederick P. Bamberger
Central Union Bank Bldg.
Evansville

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Utility Bldg.
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A. H. Huguenard
414 J. M. S. Bldg.
South Bend 5

Harry T. Ice
951 Consolidated Bldg.
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Isidor Kahn
903 Citizens Bank Bldg.
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Kurt F. Pantzer
1313 Merchants Bank Bldg.
Indianapolis 4

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518 Lafayette Life Bldg.
Lafayette

Godfrey D. Yaeger
819 Indiana Pythian Bldg.
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Mason City

Boyd M. Cambridge
4 E. 6th St.
Atlantic

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705 Roshek Bldg.
Dubuque

Harold E. Davidson
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201 Lane Bldg.
Davenport

Ervin Arthur Hutchison
602 Security Bank Bldg.
Sioux City 8

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Des Moines

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Burlington

John D. Randall
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1215 Equitable Bldg.
Des Moines

Thomas B. Roberts
Empire Bldg.
Des Moines

Arnold F. Schaetzle
203 Hubbell Bldg.
Des Moines 9

Raymond A. Smith
301 Park Bldg.
Council Bluffs

Vincent Starzinger
Register & Tribune Co.
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Jo. S. Stong
Keosauqua

Roscoe P. Thoma
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Earl Raymond Tipton
Box 387
Muscatine

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Dudley Weible
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Forest City

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Commercial Nat. Bank Bldg.
Kansas City

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Wichita 2

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United Life Bldg.
Salina

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Lester L. Morris
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Wichita 2

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Louisville

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Starks Bldg.
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Ashland

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Louisville 2

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Marion E. Taylor Bldg.
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Shreveport 24

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New Orleans 12

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New Orleans 12

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Bastrop

G. T. Owen, Jr.
710 Reymond Bldg.
Baton Rouge 6

Grove Stafford
Guaranty Bank Bldg.
Alexandria 7

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Portland

Fred C. Scribner, Jr.
903 Fidelity Bldg.
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BOJAB, Camp Holabird
Baltimore 19

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Baltimore 2

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Chevy Chase

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Baltimore 2

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Kensington

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Salem

Ralph G. Boyd
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Boston 10

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Wellesley Hills 82

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5 Jackson St.
Lawrence

Earl F. Cook
60 Boston St.
Salem

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Boston

Phillip Cowin
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Boston 8

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829 Tremont Bldg.
Boston 8

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Attleboro

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24 Elsmere Ave.
Lynn

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30 Federal St.
Boston 10

O. W. Haussermann
15 State St.
Boston 9

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82 Devonshire St.
Boston 9

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201 Devonshire St.
Boston 10

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Boston 9

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390 Main St.
Worcester 8

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11 Beacon St.
Boston 8

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Boston 8

Benjamin Spinoza
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Boston 9

Arthur E. Whittemore
220 Devonshire St.
Boston

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Lansing 8

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Royal Oak

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Detroit 26

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216 Central Tower
Battle Creek

Robert A. Carr
Damm Bldg.
Muskegon

Grant L. Cook
Penobscot Bldg.
Detroit 26

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Detroit 26

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300 Mich. Central Depot
Detroit

Selden S. Dickinson
800 National Bank Bldg.
Detroit 26

George S. Dixon
2280 Penobscot Bldg.
Detroit 26

Percy J. Donovan
1100 Ford Bldg.
Detroit 26

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Romeo

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Upjohn Co.
Kalamazoo

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Detroit

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Detroit 26

Bayre Levin
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Detroit 26

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Detroit 26

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3466 Penobscot Bldg.
Detroit 26

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Detroit 26

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Parke, Davis & Co.
Detroit 32

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Detroit 26

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Detroit 26

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Detroit 26

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Law School
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Port Huron

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St. Paul 1

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Minneapolis 3

Ray E. Cummins
330 Minn. Bldg.
St. Paul 1

John H. Farley
808 First Natl. Soo Line Bldg.
Minneapolis 2

Daniel S. Feidt
1175 Northwestern Bank Bldg.
Minneapolis 2

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425 Hamm Bldg.
St. Paul 2

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St. Paul

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St. Paul 1

Terrance Hanold
600 Metropolitan Bldg.
Minneapolis 2

Samuel Lipschultz
530 Minn. Bldg.
St. Paul 1

Perry Randolph Moore
2309 Newton Ave., S.
Minneapolis 5

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Minneapolis

A. C. Remele
760 Grain Exchange
Minneapolis 15

David R. Roberts
221 State Office Bldg.
St. Paul 1

Bruce W. Sanborn
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St. Paul

C. Paul Smith
490 N. Snelling Ave.
St. Paul 4

S. S. Smith
801 E. 32d St.
Minneapolis 7

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St. Paul 1

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1725 Morgan Ave., South
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Univ. of Minn., Pol. Sci. Dept.
Minneapolis 14

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Kansas City 6

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Kansas City 6

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St. Joseph 7

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300 Union Nat. Bank Bldg.
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706 Chestnut St.
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Kansas City 6

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Kansas City 6

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900 Bryant Bldg.
Kansas City 6

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Post Dispatch
St. Louis

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705 Olive St.
St. Louis 1

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722 Chestnut St., Rm. 601
St. Louis 1

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407 N. 8th St.
St. Louis

Maurice L. Stewart
1273 Arcade Bldg.
St. Louis 1

John R. Stockham
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St. Louis 1

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St. Louis 3

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Panhandle Eastern Pipe Line Co.
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1015 Commerce Bldg.
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108 14th St. So.
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616 Hennessey Bldg.
Butte

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Billings

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Court House
Bozeman

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Judge of Supreme Court
Lincoln

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Omaha

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Omaha 2

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Manchester

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Newark 2

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Trenton 8

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Perth Amboy

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117 Smith St.
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Univ. of New Mexico
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Los Alamos

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N. Y. 10

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N. Y. 17

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N. Y. 16

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25 Broadway
N. Y. 4

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N. Y. 14

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N. Y. 5

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Yonkers

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165 Broadway
N. Y. 6

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N. Y. 19

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N. Y. 5

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N. Y. 17

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N. Y. 5

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N. Y. 6

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N. Y. 17

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N. Y. 13

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Tuckahoe

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N. Y.

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N. Y. 4

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Buffalo 2

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N. Y. 4

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Syracuse

Samuel Miles Fink
37 Wall St.
N. Y. 5

Sumner Ford
15 Broad St.
N. Y. 5

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Naval Base
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N. Y.

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N. Y. 17

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N. Y. 5

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90 John St.
N. Y.

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70 Pine St.
N. Y. 5

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N. Y. 17

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Brooklyn 17

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N. Y. 5

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N. Y. 28

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N. Y. 4

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N. Y. 5

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N. Y.

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N. Y. 17

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N. Y. 20

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2 Wall St.
N. Y. 5

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N. Y. 20

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N. Y. 5

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N. Y. 18

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120 Broadway
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